

WESTERN DISTRICT OF PENNSYLVANIA

(ERIE)

TANIELLE SHURNEY,
Plaintiff

VS.

NO. CA 05-196E

SCOTT'S ECONO INN, INC.
SCOTT'S SPLASH LAGOON, INC.

JURY TRIAL REQUESTED

SEAN PIERCE, INDIVIDUALLY AND IN
HIS CAPACITY AS A TROOPER OF THE
PENNSYLVANIA STATE POLICE

JOHN DOE, INDIVIDUALLY AND IN HIS
CAPACITY AS THE SUPERVISOR OF
TROOPER SEAN PIERCE OF THE
PENNSYLVANIA STATE POLICE,
Defendants

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on October 13, 2005 via facsimile transmission.
2. The prediscovery disclosures have been exchanged.
3. The parties jointly proposed to the Court the following discovery plan:
 - a) Discovery will be needed on the following subjects: the interaction of the named parties and their designated employees regarding the arrest and detention of the Plaintiff;
 - b) All discovery commenced in time to be completed by March 3, 2006.
 - c) Maximum of 20 interrogatories by each party to any other party with responses due thirty days after service.

- d) A maximum of 20 requests for admissions by each party to any other party with responses due thirty days after service.
- e) Maximum of five depositions by Plaintiffs and Defendants.
- f) Each deposition limited to a maximum of two hours unless extended by agreement of the parties.
- g) Reports from retained experts would be due by March 17, 2006 by both Plaintiff and the Defendants.

4. Other items:

- a) The parties request a pretrial conference in April 2006.
- b) Plaintiff and Defendants should be allowed until March 3, 2006 to join additional parties and to amend pleadings.
- c) All potential dispositive motions should be filed by March 17, 2006.
- d) Settlement is unlikely.
- e) Final lists of witnesses and exhibits under Rule 26 (a)(3) should be due from Plaintiff and Defendants by March 24, 2006.
- f) Parties should have 20 days after service of final lists of witnesses and exhibits to list objections.

g) The case should be ready for trial by May 2006 and should take approximately three days.

Date: November 9, 2005

Respectfully submitted,



A. J. Adams
Attorney for Plaintiff



AJ Adams

October 13, 2005

Gentlemen:

I thought we could save time and energy by faxing Form 35 to each other.

I will consolidate and file our plan pursuant to the Court's Pre-Trial Order.

Plaintiff's initial disclosure is delayed pending receipt of one individual's address.



November 9, 2005

To: Gerald Hutton, Esq.
412-434-0521

Christian Bareford, Esq.
412-565-3028

Gary Bax, Esq.
814-456-2540

FROM: A. J. Adams, Esq.
814-451-6513

Gentlemen:

On October 13, 2005, I forwarded notice and a copy of Form 35 in lieu of our Rule 26 meeting. As of this date, I have not received any proposed discovery plan.

If I do not hear from you, the Plaintiff's Proposed Discovery Plan will be forwarded to the Court on November 15, 2005 pursuant to the Court's pretrial order.